



THE DEPARTMENT OF ARKANSAS
HERITAGE

March 15, 2018

Asa Hutchinson
Governor

Stacy Hurst
Director

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Arkansas Arts Council

Arkansas Natural
Heritage Commission

Arkansas State Archives

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars
Cultural Center

Old State House Museum

Re: Second Report and Order in the matter of Accelerating Wireless
Broadband Deployment by Removing Barriers to Infrastructure
Investment (WT 17-79)

Dear Ms. Dortch:

The Arkansas Historic Preservation Program (AHPP) has received and reviewed the Second Report and Order in the matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment (WT 17-79). We appreciate and understand the need for the rapid deployment of new technologies such as 5G and small cells. However, adherence to federal laws that consider broader and long-term social, economic, historic, environmental and tribal concerns must be upheld.

Given that the Draft Second Report and Order argues that “the deployment of small wireless facilities by private parties does not constitute either a ‘federal undertaking’ within the meaning of NHPA or a ‘major federal action’ under NEPA and thus that historic preservation and environmental reviews are not required,” the AHPP would like to offer the following comments and concerns.

First, although individual small cells are unlikely to adversely impact individual historic properties or districts, the FCC doesn’t address how the large scale, nationwide deployment of 5G and small cells facilities will cumulatively impact cultural and natural resources. The large scale deployment of small wireless facilities nationwide may adversely impact larger more significant historic properties including but not limited to historic districts, traditional cultural properties (TCPs) and cultural landscapes.

Second, given the rapid development in cellular technology, the cumulative impacts of newer technology that could replace the 5G wireless facilities may differ over time. Without proper review of the location on which these facilities may be placed, adverse impacts to historic properties may increase over time.



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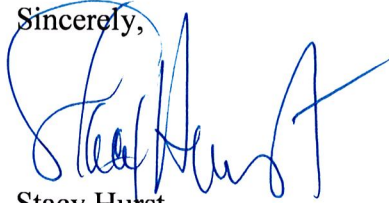
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Third, the FCC does not take into account that the deployment of small wireless facilities by private parties has the unforeseen potential to adversely impact the economic longevity that historic properties, TCPs and cultural landscapes provide to the nation's economy. This unknown impact may progressively deteriorate public resources, which may negatively impact local economies. The steady, long-term economic value provided by the preservation and utilization of historic properties is a driving force that should continue to be considered in infrastructure development and deployment.

Finally, given the nationwide scale of the deployment of 5G and small wireless facilities, it is the opinion of the AHPP that the creation of a nationwide programmatic agreement would be the most effective solution to expedite the Section 106 review process. Additionally, this would provide individual and cumulative protection to historic properties.

Thank you for the opportunity to comment on this document. The AHPP stands ready to assist the FCC at the local level in ensuring a quick and speedy review process for future undertakings. If you have any questions, please call Tim Dodson, Section 106 Manager of my staff at 501-324-9784 or email at tim.dodson@arkansas.gov.

Sincerely,



Stacy Hurst
Director & State Historic Preservation Officer

cc: Erik Hein, National Council of State Historic Preservation Officers
Anthony Guy Lopez, Advisory Council on Historic Preservation
Dr. Ann Early, Arkansas Archeological Survey